

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

PAUL JONES,

Plaintiff

DOCKET NO. 4:19-cv-11093-TSH

v.

MONTACHUSETT REGIONAL TRANSIT AUTHORITY, Et Al.,

Defendants

PLAINTIFFS VERIFIED EMERGENCY MOTION TO COMPEL PRODUCTION OF
DOCUMENTS RESPONSIVE TO PLAINTIFFS' FIRST REQUEST FOR DOCUMENTS &
INTERRAGATORIES

1. Plaintiffs submit this motion, pursuant to Rule 37(a)(3)(B)(iv) of the Federal Rules of Civil Procedure, to compel Defendant Montachusets Reginal Transit Authority ("Defendant") to produce documents responsive to Plaintiffs' First Request for the Production of Documents and Interrogatory's . For the reasons set forth below, this Court should grant Plaintiffs' motion to compel and reject defendants Boilerplate objections claiming that Plaintiff's discovery request is overbroad, unduly burdensome and on the grounds that the documents requested go beyond those allowed by the Court's Orders. As required by Local Rule 7.1, Plaintiffs have conferred in good faith with attorneys for the Defendant regarding the nature of this Motion and its legal basis and attempted to narrow the scope of the issues before this Court. After several meet and confer, counsel for the Defendant wrote that this motion "Your letter simply restates the requests of MART's responses".

” Defendant did not concur with the motion and Plaintiffs’ attempt to narrow the relevant issues proved unavailing. Plaintiffs now seek the Court’s consideration of this motion to help narrow the issues and expedite discovery in this case.

Respectfully Submitted
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June 16, 2021

/s/ Paul Jones

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